UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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DEWINA L. DANLEY.) Civil Case No. 16-cv-2872
Plaintiff,	Judge Sharon Johnson ColemanMagistrate Judge Jeffrey Cole
v.)
JOYCE R. ZYDLO, individually and as Trustee of the Stanley M. Zydlo Trust, date[d] May 26, 1981,) NOTICE OF MOTION) FOR RULE 12(b)(6) & (7)) MOTION TO DISMISS THE
Defendant) FIRST AMENDED COMPLAINT))

NOTICE OF MOTION

To:

Mason S. Cole, Esq. Amanda Banks, Esq. Cole Sadkin LLC 20 S. Clark Street, Suite 500 Chicago, Illinois 60603

PLEASE TAKE NOTICE that on Wednesday. August 3, 2016 at 8:45 a.m., the undersigned shall appear before the Honorable Sharon Johnson Coleman in the Courtroom usually occupied by her (Courtroom 1425) at the Dirksen Federal Building, 219 South Dearborn, Chicago, Illinois 60604 and then and there present Defendant's Rule 12(b)(6) & (7) Motion to Dismiss the First Amended Complaint, a copy of which motion is being served upon you.

Respectfully Submitted, Defendant, Joyce R. Zydlo, individually and as Trustee of the Stanley M. Zydlo Trust, dated May 26, 1981,

By: /s/Jeffrey C. Blumenthal

Her Attorney

Jeffrey C. Blumenthal ARDC #3124049 Jeffrey C. Blumenthal Chartered 2970 Maria Avenue, Suite 223 Northbrook, Illinois 60062 Telephone: (847) 498-3220 Facsimile: (847) 498-3221

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Notice of Motion was served on the below counsel for the plaintiffs via the Court's ECF system on July 28, 2016.

Mason S. Cole, Esq. Amanda Banks, Esq. Cole Sadkin LLC 20 S. Clark Street, Suite 500 Chicago, Illinois 60603

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By: /s/Jeffrey C. Blumenthal
Attorney for Defendant, Joyce R. Zydlo